

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
**U.S. Department of the Interior**  
**Bureau of Land Management**

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OFFICE: Applegate Field Office (AFO)

TRACKING NUMBER: DOI-BLM-CA-N070-2015-0013-DNA

PROPOSED ACTION TITLE/TYPE: North Cowhead Sage-Grouse Habitat Restoration  
Project/Juniper Thinning and Slash Burning

LOCATION/LEGAL DESCRIPTION: North Cowhead Allotment/ Township 48 N Range 17 E  
portion of sections 3, 4, 5, 6, 8, 9, 10, 15, 16, 32, 33, and 34.

APPLICANT (if any): This is a cooperative project between Natural Resource Conservation Service (NRCS), the North Cowhead livestock permittees, and the Applegate Field Office (AFO) Bureau of Land Management (BLM).

**A. Description of the Proposed Action and any applicable mitigation measures**

The proposed action is to implement a 797 acre juniper reduction project in the North Cowhead Allotment to reduce juniper encroachment into sage-steppe habitats, reduce juniper cover adjacent to sage-grouse brood rearing habitat, restore sage-grouse habitat by treating juniper in sage-steppe plant communities which are declining in vigor as a result of competition, improve hydrologic conditions, enhance the forage base for wildlife and domestic animals, and reduce hazardous fuels. The North Cowhead project area lies within the Vya Population Management Unit (PMU) Habitat Restoration and Fuels Reduction Project Programmatic Environmental Assessment (EA) analysis area which encompasses BLM lands within the Vya sage-grouse PMU where juniper is encroaching into sage-steppe habitats and lands managed by Applegate Field Office (AFO) Bureau of Land Management staff.

The project would consist of hand cutting juniper using chainsaws and lop and scatter of the boles down to a height of less than three feet or less. Piling would occur as needed in small portions of the project to avoid slash interconnecting across the project. Cut trees and piles would then be burned in place in the portions of the project area where slash is interconnected and precluded animal movements and restricts understory vegetation access to sunlight. Slash burning will not exceed 50% of the project area. Slash would be burned during the late fall to winter or early spring. No temporary roads or trails are permitted as a part of this project. Wood cutting will be allowed in designated areas. This proposed action incorporates the Standard Resource Protection Measures (SRPM), Standard Operating Procedures (SOP's) and Mitigation and Monitoring Measures outlined in the Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic Environmental Assessment CA-N070-2013-0016 for the identified project area. Within identified archaeological sites, the SOP's and mitigation outlined in the Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA CA-N070-2013-0016 will be

implemented as determined by the AFO BLM archaeologist and Field Office Manager.

## **B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans**

LUP Name Surprise Field Office Resource Management Plan (RMP) and Final Environmental Impact Statement (FEIS)

Date Approved April 2008

Other Document Sage-Steppe Ecosystem Restoration Strategy and FEIS

Date Approved December 2008

Other Document Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA

Date Approved August 2013

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

### 2008 SFO RMP FEIS.

- Section 2.22, Wildlife and Fisheries (2-92): “Conduct juniper reduction programs to enhance species composition and understory vegetation, and provide structural and age-class diversity in sagebrush ecosystems.”
- Section 2.6, Fuels Management (2-29): “Long-term restoration projects and fuel treatment plans would be developed to produce and maintain healthy ecosystems by reducing hazardous fuel build-up on a landscape level [...] to protect high-risk communities, [and] improve wildlife habitat.”
- Section 2.22.6.4 Proposed Management Actions for Group 4- Sagebrush Obligate and Associated Species: “Implement the Greater Sage-Grouse Conservation Plan for Nevada and Eastern California, First Edition (2004), including the Vya and Massacre Conservation Strategies.”
- Section 2.22.6.4 Proposed Management Actions for Group 4-Sagebrush Obligate and Associated Species: “Implement strategies and actions from “Partners in Flight—Birds in a Sagebrush Sea” and other BLM approved conservation plans specifically developed for this biome.”

### 2008 Sage Steppe Ecosystem Restoration Strategy Final Environmental Impact Statement (SSERS FEIS).

- Proposed Action (p. iii): “create an integrated, landscape-scale management Restoration Strategy that restores the sage steppe ecosystem across a 6.5 million acre Analysis Area. [...] The treatments would require site-specific environmental analysis to meet the objectives of the proposed Restoration Strategy and obtain federal agency approval prior to implementation.”

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

The Vya PMU Habitat Restoration and Fuels Reduction Project EA references and is tiered to the 2008 SFO RMP FEIS and the 2008 SSER FEIS.

- DOI-BLM-CA-N070-2013-0016-EA Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA- August 2013

List by name and date other documentation relevant to the proposed action (e.g., biological assessments, biological opinions, watershed assessments, allotment evaluations, or monitoring reports).

<b>Table 1. Pre-project Clearances for the (name of project) Clearance / Survey Type</b>	<b>Date completed</b>	<b>Responsible person(s)</b>	<b>Reference (if applicable)</b>
Noxious Weed Survey	October 23, 2013	Scott Soletti/ Andrew Mueller	North Cowhead Project Noxious Weed Survey
Botany – Special Status Plant Species/ T&E Survey	July 22, 2014	Scott Soletti, Matthew Phillip/ Amy Thorson	North Cowhead Special Status Plant Species survey and pre-treatment data collection
Botany Consultation	N/A	N/A	N/A
Wildlife – Surveys	October 23, 2013	Scott Soletti/ Andrew Mueller	North Cowhead Project Wildlife and T&E Survey
Wildlife – Habitat Assessment	October 23, 2013	Scott Soletti/ Andrew Mueller	North Cowhead Project Wildlife and T&E Survey
T&E Wildlife Consultation	June 18, 2014	Scott Soletti	North Cowhead Project No Effect on Federally Listed Warner Sucker Memorandum
Slope Stability Assessment	N/A	N/A	N/A
Stream Surveys	Used pre-existing data from Warner Sucker Monitoring	Elias Flores	Warner Sucker Monitoring Files
Site-specific BMPs Identified	September 12, 2014	ID Team	Incorporated into DR from Vya EA

Cultural Resources Surveys	April 15, 2015	Jen Rovanpera	Vya Treatment Project, Field B: Robert Neely, Logan Simpson Design Inc., Archaeological Survey 2015
Cultural Resources Consultation	Fort Bidwell December 14, 2014  Cedarville Rancheria February 14, 2014  Summit Lake April 12, 2014	Jen Rovanpera	North Cowhead Project Tribal Consultation Notes

#### **D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

**Yes.** The Vya PMU Habitat Restoration and Fuels Reduction Project EA analyzed the proposed project area within the North Cowhead Allotment. The EA identified the 797 acres within the North Cowhead Allotment for juniper treatment of which all 797 acres are suitable for hand treatment and pile burning. The Proposed Action which consists of hand cutting juniper and then burning trees in place and burning piles is included in that analysis area. The EA considered juniper reduction projects within the identified area to improve the vigor and health of sage-steppe plant communities for improvement of sage-steppe species habitats and for reducing fuels and the risk of a large catastrophic wildfire. The Proposed Action includes implementing the treatments that were identified for this area in the 2013 Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA based on the known conditions and resource concerns.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

**Yes.** The EA analyzed an appropriate range of alternatives given the purpose and need for the project. Two alternatives were analyzed in detail: (1) Proposed Action, (2) No Action. In addition, three alternatives were considered by the AFO BLM staff but dismissed from detailed analysis due to not meeting the purpose and need (See EA, section 2.3 page 36). The selected alternative is Alternative 1, the Proposed Action as described in the Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA, which identified a range of different treatments across the landscape. The 797 acre project area in North Cowhead Allotment was identified for hand treatment and pile burning in that EA. No new environmental concerns,

interests, resource values, or circumstances have been revealed since the EA was published in 2013 that would indicate a need for additional alternatives.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

**Yes.** No new information or circumstances have arisen since the EA was published in 2013 that would affect the adequacy of the analysis. The effects analysis regarding impacts to wildlife and cultural resources was extensive and appropriate for the type of landscape and project comprising the North Cowhead Habitat Restoration and Fuels Reduction Project, in that the type of treatment needed to implement the project is consistent with what was anticipated in the EA (pp. 11-21). Effects analysis in the EA regarding impacts to native sage-steppe wildlife remains adequate and no species were found during field surveys that require additional analysis. The project is not expected to contribute to noxious weed invasions and SOP's from the Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA are adequate to ensure the project does not result in new noxious weed infestations. The treatment prescription which consists of hand cutting and pile burning trees in place is appropriate based on the known resources within the project area and is a treatment prescription that was anticipated in the EA. A class II and class III archeological inventory for the Vya Treatment Project Field B in Modoc County, California and Washoe County, Nevada was completed with a report on April 15, 2015 by Robert Neely, Logan Simpson Design Inc. Based on the report, the proposed action is not expected to have any adverse effects to cultural resources and the treatment type and SRPM's for the project are appropriate based on the known resources within the project area. Effects of the project are within the scope of what was anticipated in the EA.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

**Yes.** The EA describes cumulative impacts to the entire Vya Sage-Grouse PMU and the effects that implementation of juniper reduction projects would have on vegetation, sage-steppe wildlife species, T&E species, cultural resources, riparian/wetland sites, socio-economics and livestock producers within the project area. Impacts from implementing the North Cowhead Habitat Restoration and Fuels Reduction Project would fall within those impacts analyzed and anticipated in the EA. The models and analyses used in the EA to predict impacts on the resource impacted by the proposed action remain current and appropriate at the landscape scale. The analysis of effects to sage-grouse and the proposed project is consistent with BLM policy and interim management guidance contained in IM 2012-043. No new research has come to light regarding effects that juniper reduction projects have to sage-grouse or other affected resources that would require additional analyses. Special status plant surveys and noxious weed surveys were conducted on the project area. Noxious weeds that were discovered within the project area include Bull thistle, a low priority weed species. These weed infestations will be treated prior to implementation of the project. No special status plant species were found during special status plant species survey and pre-treatment data collection. Wildlife and T&E surveys

were also conducted within the project area. No special status species were discovered during the field surveys that were not discussed and analyzed in the EA. Archaeological surveys were completed in 2014 and the proposed project is not expected to have an adverse effect on cultural resources.

The EA analysis included typical effects that would be expected at the site-specific level and identified SRMP's and SOP's that would be implemented as needed depending on site-specific conditions. There is no indication that implementing the North Cowhead Habitat Restoration and Fuels Reduction Project would result in different environmental effects than those anticipated in the EA.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

**Yes.** The North Cowhead Habitat Restoration and Fuels Reduction project is within the Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA planning area, which went through extensive public scoping prior to and during the development of the EA. Collaboration included representatives from Tribes, local representatives from Federal and State agencies, local governments, landowners, permittees, other interested persons, community-based groups, and other nongovernmental organizations. Two scoping letters were sent out to identified interested publics. The first public scoping of the Proposed Action went out via mailings to interested members of the public on November 10, 2011. The second public scoping letter went out via mailings to interested members of the public on March 6, 2013. A Draft Environmental Assessment and unsigned FONSI were sent out for a 30 day public comment period and review on June 26, 2013. Comment analysis from the scoping period for the EA and unsigned FONSI was included in the Decision Record that was signed on August 21, 2013.

On January 13, 2014 The AFO BLM sent out a scoping letter for the North Cowhead Restoration and Fuels Reduction project. One comment was received from that public scoping period, which was in regards to protection of old growth juniper. Old growth juniper will be protected as described in the Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA SOP's. Old growth pre-treatment monitoring has been completed as described in the protocol for the Sage-Steppe Ecosystem Restoration Strategy and FEIS and the Vya PMU Habitat Restoration and Fuels Reduction Project Programmatic EA.

**E. Persons/Agencies/BLM Staff Consulted**

Name	Title	Resource/Activities
Dennis Sylvia	Field Office Manager	Authorizing Officer
Casey Boespflug	Fire/Fuels Specialist	Fire and Fuels Management, Fuel Wood Utilization, Air Quality
Elias Flores	Supervisory Natural Resource Specialist	Riparian/Water Quality
Scott Soletti	Wildlife Biologist/Noxious Weed Coordinator	Wildlife, T&E Fauna, Migratory Birds, Noxious Weeds, Global

		Climate Change, Vegetation, T&E Flora
Steve Surian	Supervisory Rangeland Management Specialist	Wild Horses, Soils, Livestock Management
Steve Mathews	Rangeland Management Specialist	Livestock Management
Jennifer Rovenpera	Archaeologist	Cultural Resources, Paleontology, Native American Religious Concerns
Dan Ryan	Lands/Realty/Recreation Specialist	Recreation, VRM, Socioeconomics, Wilderness
Roger Farschon	Ecologist	DNA Review
Shawn Thornton	GIS Specialist	GIS, Maps
Andrew Mueller	Biological Sciences Technician (Wildlife)	Wildlife, T&E Fauna, Migratory Birds, and Noxious Weeds
Amy Thorson	Chicago Botanical Intern	Vegetation and T& E Flora
Matthew Phillip	Chicago Botanical Intern	Vegetation and T& E Flora

## Reviewers

/s/ Lynette Sullivan  
Invasive Species

/s/ Jen Rovanpera  
Cultural Resources

/s/ Elias Flores  
Wildlife

/s/ Steven Mathews  
Rangeland Management

**Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

☒ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

/s/ Peter Hall  
Signature of Project Lead

/s/ Roger Farschon  
Signature of NEPA Coordinator

/s/ Dennis A. Sylvia, Ph. D

Signature of the Responsible Official:

8/20/2015

Date

**Note:** The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.